

From: Steve Costa <glatzeldacosta@cox.net>  
To: Carl Goldstein/R9/USEPA/US@EPA,  
Cc: Allan Ota/R9/USEPA/US@EPA  
Date: 04/11/2006 04:14 PM  
Subject: Photo of Sludge Boat

Carl, Allan

Here is a photo of the vessel prior to the installation of the containers on the stern. I will look to see if I have any more recent. I am sending the full photo in "as snapped" resolution so you can modify/enhance the image/size/contrast/balance as desired.

Steve

*(See attached file: DSCN0096.JPG)*



From: Allan Ota/R9/USEPA/US  
To: Joe.Carney@dlnfoods.com, ppeshut@yahoo.com, Carl Goldstein/R9/USEPA/US@EPA,  
Cc:  
Date: 06/24/2003 05:35 PM  
Subject: Letter response to proposed ocean disposal of fish scrap

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Mr. Carney:  
The original is in the mail.

Peter:  
I tried to fax the letter to you, but could not do it from the 11th floor.

Please find attached the text and computer file copy of the letter.

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*(See attached file: Scrap fish response-EMAIL.wpd)*

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

June 24, 2003

Joe Carney  
Utilities Department Head  
Star-Kist Samoa, Inc.  
P.O. Box 368  
Pago Pago, Tutuila Island  
American Samoa 96799

SUBJECT: Response to Request for Ocean Dumping of Unprocessed Fish and Fish Parts

Dear Mr. Carney:

Mr. Carl Goldstein of the U.S. Environmental Protection Agency (EPA) Region IX office forwarded your letter to me and asked me to respond to your request to consider the ocean dumping of unprocessed smashed fish, fish parts, and other fish scrap. We understand that you discussed this with Mr. Peter Peshut of the ASEPA, and by your letter, dated April 8, 2003, we

understand that you are building up a backlog of fish scrap which exceeds the current processing capacity of your fishmeal plant, and you are exploring options that include ocean disposal. You have asked U.S. EPA Region IX to consider the following: (1) determine if this is possible; (2) if it is possible, how far out to sea would Star-Kist Samoa need to transport the scrap to properly dispose of it; and (3) if this is possible as a routine process, Star-Kist Samoa would like to dispose of the excess scrap in smaller quantities on the order of 50 tons per trip.

The existing fishwaste disposal site, located over 5 nautical miles offshore of Pago Pago is designated for a combination of three types of waste materials resulting from the operation of the fish canneries at Pago Pago Harbor. These include dissolved air flotation (DAF) sludge, pre-cooker water, and press water. The designation of this site involved the preparation of an environmental impact statement (EIS) that included a detailed analysis of the oceanography of the coastal offshore area, consideration of the proposed constituents to be disposed and the proposed volumes, and computer modeling to predict the dispersion of the disposal plume. Embedded in the overall analysis were other considerations such as alternatives to ocean disposal (including alternative processing operations to eliminate the need for or to minimize ocean disposal) and environmental impacts of disposal of the proposed materials. There was a regulatory (NEPA) process involved in the preparation of this EIS that involved public input, and review of and response to public concerns. In summary, there are regulatory and public process requirements that must be met in order to consider your proposed ocean dumping of fish scrap.

In light of this background information, the following can be determined at present. It is possible to consider ocean disposal of fish scrap, but only after a detailed analysis and following a regulatory and public review process, as described above. Because the existing fishwaste disposal site was the deepest and farthest offshore area investigated and analyzed in the original site designation EIS, EPA Region IX would require that the consideration of proposed disposal of a new category of fishwaste material should also include scientific investigation of the areas farther offshore and predictive modeling of the dispersion of the proposed volumes of unprocessed fish scrap. Other issues or concerns raised during the public scoping process would also need to be considered and/or analyzed. It is also important to note that an analysis of alternatives to ocean disposal is crucial to the site designation process, such as altering current practices or operations to reduce the current volume of scrap or increasing fish meal processing capacity. These would address the EPA requirement to minimize the need for ocean disposal to the maximum extent practicable.

The overall cost of a site designation study for the applicant or project proponent can vary, depending on the availability of existing data and the need to collect oceanographic data, as well as resources needed to complete the regulatory and public process, minimally on the order of hundreds of thousands of dollars up to millions of dollars. The time frame for completion, including rulemaking by EPA can also vary, again depending on the availability of existing information and the need to conduct scientific investigations as well as the level of controversy, minimally on the order of two years.

I hope this information is helpful in your consideration of options. If you have any questions, please contact me by telephone at 415-972-3476, by fax at 415-947-3537, or by e-mail at: [ota.allan@epa.gov](mailto:ota.allan@epa.gov).

Sincerely,  
**ORIGINAL SIGNED**

Allan Ota  
Oceanographer / Regional Ocean Dumping Coordinator  
U.S. Environmental Protection Agency, Region IX  
Dredging and Sediment Management Team (WTR-8)  
75 Hawthorne Street  
San Francisco, CA 94105  
415-972-3476 office  
415-947-3537 fax  
[ota.allan@epa.gov](mailto:ota.allan@epa.gov)

cc: Carl Goldstein, USEPA Region IX  
Peter Peshut, ASEPA

From: Carl Goldstein/R9/USEPA/US  
To: Allan Ota/R9/USEPA/US@EPA,  
Cc:  
Date: 06/03/2003 03:23 PM  
Subject: RE: Starkist Fish Scrap and Smashed Fish

Any progress?

Carl

----- Forwarded by Carl Goldstein/R9/USEPA/US on 06/03/2003 03:22 PM -----

**"Carney, Joe (DME)"**  
<[Joe.Carney@dlmfoods.com](mailto:Joe.Carney@dlmfoods.com)>

To: Carl Goldstein/R9/USEPA/US@EPA  
cc:  
Subject: RE: StarKist Fish Scrap and Smashed Fish

05/29/2003 06:06 PM

Hi Carl

How is everything ? Any news on the scrap fish good or bad could you let me know.

Thanks Joe

> -----

> From:

> [Goldstein.Carl@epamail.epa.gov](mailto:Goldstein.Carl@epamail.epa.gov) [SMTP:Goldstein.Carl@epamail.epa.gov]

> Sent: Monday, May 05, 2003 11:17 AM

> To: Carney, Joe (DME)

> Cc: [ppeshut@yahoo.com](mailto:ppeshut@yahoo.com)

> Subject: StarKist Fish Scrap and Smashed Fish

> Importance: High

>

>

> Hi Joe,

>

> I did receive the fax of your letter and I have forwarded it to the  
> staff person (specialist) for your ocean dumping permit for a reply.

>

> I would like to help, but unless I am wrong, our ocean dumping expert  
> will say that you cannot take the product out to sea and dump it.  
> StarKist's ocean dumping of fish waste is regulated by your Ocean  
> Dumping Permit, so the only place you can dump fish waste is in your  
> ocean dumping zone, and it is very questionable if you can dump that  
> type of "waste". Also, ocean dumping is regulated up to 200 miles as it  
> is part of the exclusive economic zone.

>

> I hope to have a letter back to you soon.

>

> Carl

>

> Carl L. Goldstein

> Program Manager

> Pacific Island Office

> USEPA, Region 9

> 75 Hawthorne St.



From: Allan Ota/R9/USEPA/US  
To: Carl Goldstein/R9/USEPA/US@EPA,  
Cc:  
Date: 03/04/2002 03:21 PM  
Subject: Re: Ocean Dumping Suggested Letter

I looked at the proposed text for the letter - it looks fine. The section you cited looks to be appropriate in terms of our ability to implement actions on permits.

Carl Goldstein

**Carl Goldstein**

03/04/2002 03:10 PM

To: Allan Ota/R9/USEPA/US@EPA

cc:

Subject: Ocean Dumping Suggested Letter

Allan,

Attached is a draft letter (very brief).

*(See attached file: oceandumpingextension.wpd)*



Allen,

The following letter would be sent to the GM's of Starkist and COS. I thought we would keep it short and sweet. Please make any changes, corrections, etc.

**Dear...**

**I write in response to your request for documentation concerning the status of your existing Marine Protection, Research and Sanctuaries Act § 102 Ocean Dumping Permit, OD93-01 (Starkist is 01 and COS is 02).**

**Under the authority of 40 CFR Part 220.4, your present permit, OD93-01, is still in effect until EPA Region 9 completes its review of your application for a new special ocean dumping permit.**

**If you have any questions, please contact myself or Allan Ota (415-972-3476).**

Sincerely,

Carl L. Goldstein  
Program Manager  
Pacific Islands Office

cc: ASEPA  
Allan Ota

From: Carl Goldstein/R9/USEPA/US  
To: Allan Ota/R9/USEPA/US@EPA,  
Date: 03/21/2001 01:24 PM  
Subject: Letter to StarKist

Hi Allan,

I have attached the StarKist letter for your editing/comment. I would appreciate your comments by this Friday.

*(See attached file: canneryquestions.wpd)*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX

Pacific Insular Areas Program  
75 Hawthorne Street  
San Francisco, CA 94105

March 20, 2001

Phil Thirkell  
General Manager  
StarKist Samoa, Inc.  
PO Box 368  
Pago Pago, AS 96799

Dear Mr. Thirkell:

Thank you for your earlier letter, dated February 16, 2001. I too appreciated having the opportunity to meet with you and your staff to discuss various EPA concerns that either have direct or indirect involvement for your company. In addition to the questions posed in your letter, a few other questions have arisen, mostly in conversations between your staff and ASEPA, that I will also address.

1. **Can either cannery use the ocean disposal capacity of the other cannery?** Yes, as long as all other conditions of the ocean dumping permit are met. Each cannery is allotted 200,000 gallons on the ocean disposal barge. If either cannery chooses to allow the other cannery to use part of its allotment, that is acceptable, as long as all other conditions of the permit continue to be met.
2. **Can the canneries use 200,000 gallons of any combination of the three waste streams instead of the specified volumes of waste streams in Table 2 of the ocean dumping permit presently in effect?** Yes. The new proposed ocean dumping permit allows any combination of the waste streams. At this time, we find it acceptable to modify (by virtue of this letter) the existing permit to allow this variance.
3. **Can the canneries continue to dispose unprocessed fish waste at the ocean dumping site?** Yes. Ocean disposal of unprocessed fish waste is not regulated by EPA, and it is our understanding that the canneries and ASEPA reached agreement on this many, many years ago.
4. **What is the definition of "Floatables"?** No firm definition at this time. However, we do concur with your view that the temporary flotation of the permitted waste stream is not a "floatable" and as such would not constitute a violation of the permit.
4. **Do the canneries have the option to dispose their processed fish waste 3-5 miles further out to sea from the present ocean disposal site?** No, except for emergency

conditions, as described in the permit. Unfortunately, using an undesignated site, even though "further away", is not allowed. However, if the canneries are interested in applying for a permit to establish a different ocean disposal site that is further out to sea, EPA Region 9 is receptive to that idea, and would welcome a study proposal from the canneries that would move the ocean disposal site further out to sea.

As part of the permitting process for a new ocean disposal site, the requirements of the National Environmental Policy Act (NEPA) would have to be met. At this time we are hopeful that an EIS would not be necessary, but we cannot make that determination at this time. We can say that a proposal should at least include a drogue study (perhaps every ½ mile or 1 mile from the shoreline to the proposed site), current regime description, dispersion model, and wastewater characterization.

I appreciate your concern, interest, and active participation in preserving and protecting the marine environment in American Samoa. As both ASEPA and EPA Region 9 move forward with their watershed protection plans and Pago Pago harbor water quality monitoring strategy, we look forward to the participation of your company.

Please contact me if there are any other questions, or if I can be of further assistance (goldstein.carl@epa.gov; 415-744-2170; fax: -1604).

Sincerely,

Carl L. Goldstein  
American Samoa Program Manager  
Pacific Insular Area Programs

cc: Togipa Tausaga, ASEPA

From: Allan Ota/R9/USEPA/US  
To: "Griffitts, Thomas LT" <TGriffitts@D14.USCG.mil>,  
Cc: MRand@D14.USCG.mil, JSifling@D14.USCG.mil, CCuratilo@D14.USCG.mil, Carl Goldstein/R9/USEPA/US@EPA, Tim Vendlinski/R9/USEPA/US@EPA  
Date: 01/26/2001 09:57 AM  
Subject: Re: FW: TASMAN SEA

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Lt. Griffiths:

Thank you for the update re. your latest inspection of operations. Your recommendation for a new permit condition that requires real-time discharge rate monitoring seems reasonable and important in light of your observations. I don't believe I need any more information for now. As we develop the new permit conditions this year, including those that we discussed in our meeting last December, I will send the amended / revised text to you for your review and comment.

Thanks again for your assistance.

- Allan

"Griffitts, Thomas LT" <TGriffitts@D14.USCG.mil>

"Griffitts, Thomas LT"  
<TGriffitts@D14.USCG.mil>

To: Allan Ota/R9/USEPA/US@EPA  
cc:  
Subject: FW: TASMAN SEA

01/23/2001 06:55 PM

> -----Original Message-----

> From: Griffiths, Thomas LT

> Sent: Tuesday, January 23, 2001 4:10 PM

> To: 'aota@epa.gov'

> Cc: Rand, Michael CDR; Sifling, John LCDR; Curatilo, Christopher LT

> Subject: TASMAN SEA

>

> Allan, I wanted to let you know, we conducted a monitor of the TASMAN SEA

> on 11JAN01. They followed the permit in their positioning and dumping.

> The only potential discrepancy I noted was that there is no way to verify

> the discharge rate during the time of discharge. They figure out the

> discharge rate after the trip by taking the amount that was loaded and

> dividing it by the time they spend discharging. Evidently the Captain is

> not able to get a solid number of how much cargo was loaded until after

> his trip. I believe he was within the permit. Captain Crook has been

> doing it for awhile and seems to have a good feel for the capacity of

> discharge versus speed and probably does not exceed the allowable

> discharge rate. But, the current operation certainly leaves room for

> error, especially if a new Captain were to take over. I would recommend

> that the permit specifically require a means to verify that discharge

> rates do not exceed the allowance during the time of discharge. The best

> way to accomplish this would be to install a gauge in the discharge lines.

> I believe this would be a relatively cheap fix.

>

> Please let me know if you would like more information,

> Tom

>  
> LT Tom Griffitts  
> Supervisor, MSD American Samoa  
> Office: 011(684)633-2299  
> Cell: 011(684)258-7001  
> Fax: 011(684)633-1933  
> email: tgriffitts@dl4.uscg.mil

From: Carl Goldstein/R9/USEPA/US  
To: Allan Ota/R9/USEPA/US@EPA,  
Date: 01/16/2001 08:13 AM  
Subject: Ocean Disposal Violation Letter

These were faxed on January 11. If you want a copy with signature, please let me know.

*(See attached file: dumpingviolation.wpd) (See attached file: dumpingviolation2.wpd)*

Carl

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
**Pacific Insular Areas Program**  
**75 Hawthorne Street**  
**San Francisco, CA 94105**

January 11, 2001

Herman Gebauer  
General Manager  
COS Samoa Packing, Inc..  
P.O. Box 957  
Pago Pago, AS 96799

Dear Mr. Gebauer:

A few days ago, we were informed by the American Samoa EPA that fish waste had washed up in various locations on the shorelines of Tutuilla, AS in the latter part of December 2000. Alega beach was mentioned specifically with regards to this incident. ASEPA also informed us that ASEPA was contacted by the canneries and told that the canneries were cleaning their sludge tanks and intended to dispose of the waste from the sludge tank cleaning operation at the designated ocean dumping site in your Ocean Dumping Permit.

My staff then contacted COS Samoa Packing and learned that the incident did occur. Since that time, we have received letters from both your company and StarKist Samoa concerning this incident.

Upon detection of a violation of any permit requirement for your Ocean Dumping Permit, (in this case, at a minimum, the violation concerns Section 1.4.5), the permittee is required to send a written notification of the violation to EPA Region 9 and the ASEPA within five working days, and a detailed written report of the violation to these agencies within 15 working days (see Section 3.3.4). **Had we not made contact initially, EPA Region 9 might never have received word from either COS Samoa Packing or StarKist Samoa about this possible violation of your Ocean Dumping Permit.**

On January 10, 2001, we did receive a letter from each COS Samoa Packing, and StarKist Samoa, advising us of the subject incident. By January 25, 2001, COS Samoa and StarKist Samoa shall submit a detailed written report (report may jointly written) to EPA Region 9 and ASEPA that at a minimum provides the following information with regard to this violation:

1. A description of the sludge cleaning and disposal operation that caused the violation, including the date, time, volume and description of sludge, operational procedures, and a chronological history of previous sludge tank cleaning and disposal events in which sludge tanks were cleaned and the waste sludge produced by the cleaning operation was disposed of at the designated ocean dumping site.



2. The response by COS Samoa Packing and StarKist Samoa towards identifying the shoreline areas that may be or were affected by the sludge waste; and the removal, clean-up, and disposal efforts for those areas where the sludge waste was discovered.
3. The operational and maintenance procedures that will be immediately instituted by COS Samoa Packing and StarKist to prevent the problem of flotables, and any other unpermitted sludge waste, from being disposed at the ocean dump site.
4. The written procedures (clean-up) that are in place, or to be developed, to respond to an incident of sludge waste being washed up on the shorelines in American Samoa.

As EPA Region 9 staff review the information submittals detailed above, other information specific to this incident and related to any aspects of ocean disposal may be required as additional submittals to our office. Please be reminded that any person who violates any provision, term, or condition of this permit shall be liable for a civil penalty of not more than \$50,000 per day for each violation. Additionally, any knowing violation of the permit may result in a criminal action being brought with penalties of not more than \$50,000 or one year in prison, or both.

If you have any questions, please contact Carl L. Goldstein, American Samoa Program Manager, (Ph: 415-744-2170; fax: 415-744-1604; email: [goldstein.carl@epa.gov](mailto:goldstein.carl@epa.gov)).

Sincerely,

Norm Lovelace  
Manager  
Pacific Insular Area Programs

cc: ASEPA  
StarKist Samoa  
Jim Cox

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
**Pacific Insular Areas Program**  
**75 Hawthorne Street**  
**San Francisco, CA 94105**

January 11, 2001

Phil Thirkell  
General Manager  
StarKist Samoa, Inc.  
P.O. Box 368  
Pago Pago, AS 96799

Dear Mr. Thirkell:

A few days ago, we were informed by the American Samoa EPA that fish waste had washed up in various locations on the shorelines of Tutuilla, AS in the latter part of December 2000. Alega beach was mentioned specifically with regards to this incident. ASEPA also informed us that ASEPA was contacted by the canneries and told that the canneries were cleaning their sludge tanks and intended to dispose of the waste from the sludge tank cleaning operation at the designated ocean dumping site in your Ocean Dumping Permit.

My staff then contacted COS Samoa Packing and learned that the incident did occur. Since that time, we have received letters from both your company and COS Samoa Packing concerning this incident.

Upon detection of a violation of any permit requirement for your Ocean Dumping Permit, (in this case, at a minimum, the violation concerns Section 1.4.5), the permittee is required to send a written notification of the violation to EPA Region 9 and the ASEPA within five working days, and a detailed written report of the violation to these agencies within 15 working days (see Section 3.3.4). **Had we not made contact initially, EPA Region 9 might never have received word from either COS Samoa Packing or StarKist Samoa about this possible violation of your Ocean Dumping Permit.**

On January 10, 2001, we did receive a letter from each COS Samoa Packing, and StarKist Samoa, advising us of the subject incident. By January 25, 2001, COS Samoa and StarKist Samoa shall submit a detailed written report (report may jointly written) to EPA Region 9 and ASEPA that at a minimum provides the following information with regard to this violation:

1. A description of the sludge cleaning and disposal operation that caused the violation, including the date, time, volume and description of sludge, operational procedures, and a chronological history of previous sludge tank cleaning and disposal events in which sludge tanks were cleaned and the waste sludge produced by the cleaning operation was disposed of at the designated ocean dumping site.

2. The response by COS Samoa Packing and StarKist Samoa towards identifying the shoreline areas that may be or were affected by the sludge waste; and the removal, clean-up, and disposal efforts for those areas where the sludge waste was discovered.
3. The operational and maintenance procedures that will be immediately instituted by COS Samoa Packing and StarKist to prevent the problem of flotables, and any other unpermitted sludge waste, from being disposed at the ocean dump site.
4. The written procedures (clean-up) that are in place, or to be developed, to respond to an incident of sludge waste being washed up on the shorelines in American Samoa.

As EPA Region 9 staff review the information submittals detailed above, other information specific to this incident and related to any aspects of ocean disposal may be required as additional submittals to our office. Please be reminded that any person who violates any provision, term, or condition of this permit shall be liable for a civil penalty of not more than \$50,000 per day for each violation. Additionally, any knowing violation of the permit may result in a criminal action being brought with penalties of not more than \$50,000 or one year in prison, or both.

If you have any questions, please contact Carl L. Goldstein, American Samoa Program Manager, (Ph: 415-744-2170; fax: 415-744-1604; email: [goldstein.carl@epa.gov](mailto:goldstein.carl@epa.gov)).

Sincerely,

Norm Lovelace  
Manager  
Pacific Insular Area Programs

cc: ASEPA  
COS Samoa Packing  
John Brown

From: Allan Ota/R9/USEPA/US  
To: [expat3@hotmail.com](mailto:expat3@hotmail.com),  
Cc: Tim Vendlinski/R9/USEPA/US@EPA, Norm Lovelace@EPA, Carl Goldstein/R9/USEPA/US@EPA  
Date: 01/04/2001 02:35 PM  
Subject: Christmas sludge spill

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Sheila:

Got your message (despite some kind of delivery error message) regarding the recent spill over the holidays. Understand that sample were collected and now in refrigeration. I had put in a call to our Richmond lab regarding analytical capabilities (i.e., spectrographic/fingerprinting methodology) and availability for the purposes we discussed during my visit. Waiting for reply from lab.

In the meantime, please send me any other details about the samples. Did you get samples at both the impact sites as well as source (i.e., canneries)? - for comparison. Also, what kind of volumes of samples have been collected, type of containers, etc. If analysis is possible here in our lab, we'll have to work out the logistics.

What a way to start the new year!  
- Allan

From: Allan Ota/R9/USEPA/US  
To: Tim Vendlinski/R9/USEPA/US@EPA,  
Cc: Norm Lovelace@EPA, Carl Goldstein/R9/USEPA/US@EPA, Thomas Yocom@EPA,  
Date: 01/04/2001 02:11 PM  
Subject: Fwd: Sludge spill over Christmas

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Tim and Tom: FYI (see below).

Norm and Carl: Forwarding this (see below) to you because I was not sure that you got this message from Sheila. There was some kind of delivery error message attached to the e-mail, but it somehow arrived at my address anyway. (I could not even forward the message directly for some reason - had to cut and paste it to send to you)

I had put in a call to the Richmond lab to find out about our analytical capabilities for these samples that have been collected.

I'll let you know what I find out (hopefully soon).

- Allan

To: Allan Ota/R9/USEPA/US@EPA  
CC:  
Fax to:  
Subject: Sludge spill

Hi all,

Well, we got a Christmas present of sludge all over the place. The canneries informed us that they were cleaning their sludge tanks and would dispose of the sludge at the ocean dump site. Well, it washed up in Alega, Nuuli, Coconut Point, Matuu. As soon as it was washed up, we got calls from Tisa and we went out and so did the canneries. The cannery personnel went to Alega to clean it up. This went on for a day or so. I did not hear more so I assumed the cannery clean up was satisfactory. It was not. I'm not all sure what happened, but over the Christmas weekend, after Tisa had kicked the canneries clean up team out, she failed to call me (she had all my numbers) and she and her boyfriend collected the sludge by hand and put it in plastic bags and piled it up. The canneries offered to take it, but she refused. She called me on Monday and I went out to check. The smell of the sludge piled up in the sun was quite pungent. I then brought in Frank McCoy and they cleaned the beach to Tisa's satisfaction. We also had Frank investigate the "mat of sludge" two days in a row to no avail. He drove around the ocean looking for the "mat" and only found small patches--this was after Christmas so it had probably dissipated.

Sorry to give you the news. I am told Tisa has engaged a lawyer (Marie Lafaele--remember her NORM?) and that they have initiated an environmental group to go after the problem. I will be meeting with the canneries in the next day or so to follow up on the problem--they have been off for the holidays and we will determine a course of action to document and determine the cause of the problem. We have several samples that can be analysed--now refrigerated. It would probably help me to have some advice on what to analyse for. I'll let you know what the outcome of the meeting is. I

appreciate any advice/assistance from you all. Sorry, but no rest is allowed in pursuit of environmental protection.

Sheila

---

Get Your Private, Free E-mail from MSN Hotmail at <http://www.hotmail.com>.

From: Carl Goldstein/R9/USEPA/US  
To: Allan Ota/R9/USEPA/US@EPA,  
Cc: Michael Lee/R9/USEPA/US@EPA  
Date: 05/18/1998 01:09 PM  
Subject: COS Samoa Packing Ocean Dumping Permit

Allan,

I asked Steve to comment on possible reasons for the recent variability in the total solids and total volatile solids in the high strength waste.

----- Forwarded by Carl Goldstein/R9/USEPA/US on 05/18/98 01:07 PM -----  
To: Carl Goldstein/R9/USEPA/US  
CC:  
Subject: COS Samoa Packing Ocean Dumping Permit

---

Carl-

Per your request I sent you an email last week concerning the COS Samoa Packing Ocean Dumping monitoring for solids.

For some reason it got kicked back over the weekend. I will try this again and fax it as well. My comments are presented below.

Steve Costa

-----  
There are a number of possible reasons for recent increases in concentrations of total solids and total volatile solids in the COS Samoa Packing high strength waste (HSW) to be disposed of by ocean dumping. It should be recognized that there is a large degree of variability in the monitoring records as noted in my letter to Terry Oda, dated 12 February 1998. The standard deviation is nearly the same magnitude as the mean and the actual values vary by more than an order of magnitude for total solids and two orders of magnitude for total volatile solids. Reasons for what appears to be increased solids concentrations in the more recent data may include:

[1] There may be more efficient HSW segregation resulting in less inadvertent diversion of water and low strength waste streams to the HSW on-shore storage tank. There is a continuing effort to minimize the volumes for ocean dumping (balanced against the effort to segregate the wastes) which may result in less total volume with the same, or increased, amounts of solids delivered to the onshore storage tank. This could result in increased concentrations of solids in the HSW.

[2] It is suspected that there is stratification in the onshore storage tank which could be enhanced by the polymers that are used. Monitoring samples are collected only during a limited time during pumping from the tank to the barge. COS recently added an additional mixer to the tank. These factors could combine with other factors, such as frequency and volume of individual disposal episodes, to result in an apparent change in solids concentrations in the samples. The grab sample results are expected to be quite variable under any circumstances and recent changes in the process may exacerbate this.

[3] Changes in production or changes in the size of the fish being processed, or both, may change the nature of the HSW. It is noted that larger fish were being processed at about the time of increased solids concentration. This also resulted in increased production tonnage.

Please call or have Terry call with any questions or comments,

Thanks for your time and attention to this matter,

Steven L. Costa

Fone: 707-826-0717 or 7662

Phax: 707-822-0567

Smail: P.O. Box 1125, Arcata, CA 95518

Xmail: 1440 Union Street, Arcata, CA 95521

Email: [glatzeldacosta@sprintmail.com](mailto:glatzeldacosta@sprintmail.com)